

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

IN RE HUDSON'S BAY COMPANY DATA  
SECURITY INCIDENT CONSUMER  
LITIGATION

Case No. 1:18-cv-08472 (PKC)

**PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY  
APPROVAL OF CLASS ACTION SETTLEMENT**

Plaintiffs in the above-captioned action ("Plaintiffs"), by and through their attorneys, respectfully move this Court for an Order preliminarily approving the proposed class action settlement ("Settlement"), approving the form of notice, and scheduling the Final Approval Hearing as set forth in the Settlement Agreement attached as Exhibit A to the Joint Declaration of Janine L. Pollack and Timothy J. Peter ("Joint Declaration"). Specifically, Plaintiffs ask that the Court enter the proposed Order, thereby

1. granting Preliminary Approval of the Settlement;
2. approving the proposed Notice Program;
3. appointing Analytics LLP as Settlement Administrator and directing it to commence the Notice Program;
4. conditionally certifying the proposed Settlement Class for the purposes of Settlement;
5. appointing Plaintiffs as Class Representatives for the Settlement Class and Timothy J. Peter of Faruqi & Faruqi, LLP and Janine L. Pollack of Calcaterra Pollack LLP as Class Counsel for the Settlement Class; and
6. scheduling a Final Approval Hearing.

In support of this Unopposed Motion, Plaintiffs rely on the attached Memorandum of Law, the

Joint Declaration and its supporting exhibits, all documents filed therewith, and the arguments of counsel.

DATED: May 27, 2020

/s/ Timothy J. Peter

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